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March 9, 2016

Honorable Judge James L. Garrity
United States Bankruptcy Judge
United States Bankruptcy Court
One Bowling Green
New York, NY 10004

RE: Cocoltzi v Orly AP Case No. 16-01020(jlg)

Dear Honorable Judge Garrity:

Please be advised that the undersigned filed an appearance this morning on behalf of the defendant, Mr. Amir Orly, a chapter 7 Debtor. This firm will be representing the Defendant in the pending adversary proceeding, and not in the base chapter 7 case in which another firm appears as counsel of record.

Prior to filing her appearance, the undersigned discussed the status of this case with opposing counsel, Joshua Androphy, and the parties agreed to extend the answer date, slightly, to April 11, 2016. It seems that the complaint was filed on February 6, 2016 the summons was issued on February 10, 2016 and the certificate of service filed on March 7, 2016 indicating service was made on March 4, 2016. At this time a formal stipulation to extend time is drafted and circulated for counsels' signatures and the undersigned expects to present the same to the court with request for entry, very soon.

In light of the above, the parties agreed and hereby respectfully request that the pre trial conference, currently scheduled for March 15, 2016, be adjourned to a date convenient to the Court in May 2016. Attorney Androphy has advised that his schedule renders him unavailable between April 11 and April 30, 2016, hence the joint request for an adjourned date in May 2016.

Thank you for your time and attention to this matter, I remain

Very truly yours,

/s/Linda M. Tirelli

Linda M. Tirelli, Esq.

Cc:

Joshua Androphy, Esq.
Mr. Amir Orly